UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

18 Civ. 8175 (ER)

against –

ECF CASE

BARRY C. HONIG, ROBERT LADD, ELLIOT MAZA, BRIAN KELLER, JOHN H. FORD, GRQ CONSULTANTS, INC.,

and HS CONTRARIAN INVESTMENTS, LLC,

Defendants.

STIPULATION AND [PROPOSED] ORDER AMENDING CIVIL CASE DISCOVERY PLAN AND SCHEDULING ORDER

IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, that the following provisions of the Civil Case Discovery Plan and Scheduling Order, entered on January 22, 2020, shall be amended as follows:

- 1. Fact discovery cut-off: July 21, 2020.
- 2. Requests to Admit and contention Interrogatories, if any, shall be served no earlier than 45 days prior to the fact discovery cut-off, or <u>June 5, 2020</u>, and Responses to any Requests to Admit and contention Interrogatories, if any, shall be due 30 days thereafter. Responses to Requests to Admit and contention Interrogatories served prior to this Stipulation and Order shall be adjourned until July 6, 2020.
 - 3. Expert reports shall be served no later than August 11, 2020.
 - Rebuttal expert reports shall be served no later than **September 8, 2020**. 4.
 - 5. Expert depositions shall be completed by October 6, 2020.

- 6. ALL DISCOVERY SHALL BE COMPLETED BY <u>October 6, 2020</u>, unless an Answer has not yet been filed. If an Answer has not been filed by October 6, 2020, the parties will confer and jointly propose, within one week after Defendant files his Answer, a schedule for additional Discovery.
- 7. If an Answer is filed by October 6, 2020, the Court will hold a status conference on <u>October 20, 2020</u>, or another time convenient for the Court. During that status conference, the parties will present a proposed schedule for any motions for summary judgment, pre-trial submissions and trial.

Dated: New York, New York April 1, 2020

ROBERT LADD SECURITIES AND EXCHANGE COMMISSION

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SO ORDERED: